

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Criminal No. CR 17-14 DWF

UNITED STATES OF AMERICA,

Plaintiff,

INFORMATION

v.

18 U.S.C. § 2252(a)(2) and 2252(b)(1)

JAMES LESTER PARAMORE,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

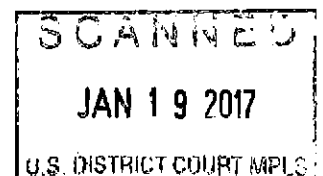
COUNT 1
(Distribution of Child Pornography)

On or about June 12, 2016, in the State and District of Minnesota, the defendant,

James Lester Paramore

did knowingly distribute visual depictions using a means and facility of interstate and foreign commerce and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: computer image files entitled:

1. 13435657_1624931834491117_2024278494_n.jpg, which depicts an adult male penis ejaculating on a pre-pubescent male's face;



2. **13453598_1624931844491116_2019789219_n.jpg**, which depicts two naked pre-pubescent males with their genitals exposed and erect;
3. **13444466_1624931854491115_1469502237_n.jpg**, which depicts pre-pubescent males performing oral sex;
4. **13453651_1624932787824355_838810579_n.jpg**, which depicts a pre-pubescent male holding two erect adult male penises; and
5. **13444062_1624932797824354_1255836370_n.jpg**, which depicts two naked pre-pubescent males sitting on a couch with their legs in the air and genitals exposed;

all in violation of Title 18, United States Code, Section 2252(a)(2), 2252(b)(1).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of any of the foregoing offenses, the defendant,

JAMES LESTER PARAMORE

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to:

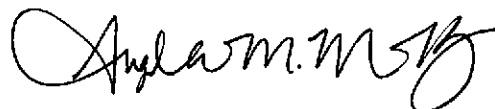
- a. one Samsung Tablet, serial number R5FA0H98PS;
- b. one Samsung Galaxy S3;
- c. one HP Laptop, serial number CNF036FWNB; and
- d. one LG Desktop Computer Tower.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(1), 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

Dated: 1/19/17

ANDREW M. LUGER
United States Attorney



BY: ANGELA MUNOZ-KAPHING
Assistant U.S. Attorney
Attorney ID No. 389207